

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

V.

HERBERT WRIGHT III,

Defendant.

Crim. No. 20-30033-MGM

DEFENDANT'S MOTION TO MODIFY DISCOVERY SCHEDULE

Pursuant to Local Rule 116.1, Defendant Herbert Wright, III (“Wright”) submits the following motion to modify certain discovery deadlines set forth in the Court’s Order dated December 9, 2020. (Doc. No. 49). In support of this motion, Wright states as follows.

1. On December 9, 2020, the Court issued an order providing that “[t]he government will complete its automatic disclosures by January 6, 2021.” (Order, Doc. No. 49, citing LR 116.1(c)(1) and (2)). The Court further ordered that “[a]ny discovery request letters shall be sent and filed by the defendant by January 20, 2021.” *Id.*, citing See LR 116.3(a) and (h).

2. Wright understands that the government has been working to produce automatic discovery to Wright, but that it has not yet been able to complete such discovery.

3. This Court's December 9 Order and Local Rule 116.3(a) both contemplate that the defendant shall have 14 days from the completion of automatic discovery to file discovery request letters. Wright cannot effectively exercise his right to submit discovery requests until after the government has completed automatic discovery.

4. Accordingly, by this motion, Wright requests that the Court modify its December 9, 2020 Order to extend Wright's time to file discovery request letters from January 20, 2021 to a date fourteen (14) days after the government completes its automatic discovery.

WHEREFORE, Defendant Herbert Wright, III moves that his deadline to file discovery request letters be extended from January 20, 2021 to a date fourteen (14) days after the government completes automatic discovery.

HERBERT WRIGHT, III,

By his attorney,

/s/ James W. Lawson
James W. Lawson (BBO #289300)
jlawson@princelobel.com
PRINCE LOBEL TYE LLP
One International Place, Suite 3700
Boston, MA 02110
Phone: (617) 456-8143
Fax: (617) 456-8100

Date: January 20, 2021

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document filed through the CM/ECF system on January 20, 2021 will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and by first-class mail to any non-registered participants.

/s/ James W. Lawson
James W. Lawson